

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: RONALD JAMES STEWART AND  
CAROLYN JEAN STEWART**

**BANKRUPTCY CASE NO: 14-14123-JDW**

**MOTION TO MODIFY CONFIRMED PLAN**

**COMES NOW**, Carolyn Jean Stewart, by and through the undersigned attorney Susan C. Smith and prays this Honorable Court will Modify the Confirmed Plan due to hardship, and allow the Plan to be completed as early as possible Debtor states to wit:

1. Debtors filed their petition for bankruptcy November 4, 2014;
2. Mr. Ronald J. Stewart died August 18, 2016 and the Debtor has been struggling to make her payments but taxes and insurance keep rising ;
3. Through order of this court dated June 24, 2015, the Debtors were asked to pay an additional amount to pay all general unsecured claims in full. The remaining Debtor no longer has all the resources the Joint Debtors possessed at the time of filing or upon June 24, 2015. It is an extreme hardship upon the remaining Debtor; and,
4. Creditors have received more than they would have through a Chapter 7 liquidation.

**WHEREFORE PREMISES CONSIDERED**, the Debtor by and through the undersigned attorney Susan C. Smith prays this Honorable Court will order all payments to the unsecured creditors to cease and allow the Debtor to complete her modified plan and for all else deemed just and equitable by this Honorable Court.

This the 26th day of April 2019.

Carolyn J Stewart  
BY: /s/ Susan C. Smith  
Susan C. Smith

Of Counsel:  
/s/ Susan C. Smith  
Susan C. Smith, 99776  
PO Box 1251  
Greenville, MS 38702  
Phone 662-378-2558  
Fax 662-378-2543  
Email [smithsusanc@bellsouth.net](mailto:smithsusanc@bellsouth.net)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: RONALD JAMES STEWART AND  
CAROLYN JEAN STEWART**

**BANKRUPTCY CASE NO: 14-14123-JDW**

**NOTICE OF MOTION TO MODIFY CONFIRMED PLAN**

**YOU ARE HEREBY NOTIFIED** that you have thirty (30) to file a written objection to the attached Motion to Modify Confirmed Plan. Said objection must be filed with the Clerk of this Court at the following address.

Clerk, U. S. Bankruptcy Court  
Northern District of Mississippi  
703 Highway 145 North  
Aberdeen, Mississippi 39730

A copy of said objection must be served on the undersigned Debtor(s) attorney and the Chapter 13 Trustee on or before May 28, 2019, and the Court will notify you of the date, time and place of the hearing thereon. If no objections are filed timely, the Motion to Modify Confirmed Plan shall be deemed valid.

**CERTIFICATE OF SERVICE**

I, Susan C. Smith, attorney for the Debtor, do hereby certify that I have this day electronically filed or mailed by U. S. Mail, postage prepaid, a true and correct copy of the Motion and Notice of Motion to Modify Confirmed Plan to the following at their last known address:

**BY ELECTRONIC FILING:**

U. S. Trustee  
Locke D. Barkley Chapter 13 Trustee  
Kimberly D. Mackey on behalf of Creditor Wells Fargo Bank, NA

**BY U. S. MAIL:**

Carolyn J. Stewart  
8445 Juanita Dr.  
Olive Branch, MS 38654-8072

And attached list of creditors

THIS the 26th day of April, 2019.

/s/Susan C. Smith  
SUSAN C. SMITH, MSBN 99776  
POB 1251  
Greenville, Mississippi 38702-1251  
662-378-2558  
[smithsusanc@bellsouth.net](mailto:smithsusanc@bellsouth.net)

AmeriCredit Financial Services, Inc.  
PO Box 183853  
Arlington, TX 76096

AmeriCredit Financial Services, Inc.  
dba GM  
PO Box 183853  
Arlington, TX 76096

AmeriCredit Financial Services, Inc.  
dba GM Financial  
PO Box 183853  
Arlington, TX 76096

Aurora Financial Group  
9 Eves Drive, Suite 190  
Marlton, NJ 08053-8114

Audit Systems Incorporated  
3696 Ulmerton Road, Suite 200  
Clearwater, FL 33762-4237

\* Citi Bank/Sears Card  
PO Box 6500  
Sioux Falls, SD 57117-6500

\* CACH, LLC  
PO Box 10587  
Greenville, SC 29603-0587

\* Capital Management Services, L  
PO Box 120  
Buffalo, NY 14220-0120

\* City of Milwaukee-Milwaukee Water  
Works  
841 N. Broadway Room 406  
Milwaukee, WI 53202

\* City of Milwaukee  
City Treasurer, City Hall  
200 E. Wells St., Room 103  
Milwaukee, WI 53202-3546

\* City of Milwaukee Neighborhood  
Services  
4001 S. 6<sup>th</sup> St.  
Milwaukee, WI 53221-1704

\* GE Money Bank/Belk  
Attn: Bankruptcy Department  
PO Box 103104  
Roswell, GA 30079-9104

\* City of Milwaukee-Milwaukee Water  
Works  
City Treasurer, City Hall  
200 E. Wells St., #800  
Milwaukee, WI 53202-3546

Financial Recovery Services  
PO Box 385908  
Minneapolis, MN 55438-5908

\* HSBC Bank/Menards  
Attn: Bankruptcy Department  
PO Box 5213  
Carol Stream, IL 60197-5213

\* GE Financial  
Attn: Bankruptcy Department  
PO Box 183853  
Arlington, TX 76096-3853

\* HSBC Bank  
Attn: Bankruptcy Department  
PO Box 5213  
Carol Stream, IL 60197-5213

Northland Group, Inc.  
PO Box 390846  
Minneapolis, MN 55439-0846

Harris and Harris LTD  
111 West Jackson Blvd  
Chicago, IL 60604-4135

\* Kenwood Law Group  
5050 Palo Verde St. Suite 116  
Montclair, CA 91763-2333

Recovery Management Systems  
Corporation  
25 S.E. 2nd Ave, Suite 1120  
Miami, FL 33131-1605

\* PNC Mortgage  
PO Box 6534  
Carol Stream, IL 60197-6534

Portfolio Recovery Associates, LLC  
PO Box 41067  
Norfolk, VA 23541

Seterus, Inc  
PO Box 2008  
Grand Rapids, MI 49501-2008

\* Sears MasterCard  
PO Box 183082  
Columbus, OH 43218-3082

Selene Finance  
PO Box 422039  
Houston, TX 77242-4239

The Home Depot/CBSD  
Legal Dept.  
PO Box 6034  
Sioux Falls, SD 57117-6034

Carolyn Jean Stewart  
8445 Juanita Drive  
Olive Branch, MS 38654-8072

Attorney Kevin Sullivan  
Agent for the City of Milwaukee  
841 N. Broadway Room 1018  
Milwaukee, WI 53202

\* U.S. Bank National Association  
14841 Dallas Parkway, Suite 300  
Dallas, TX 75254-7883

<p>* US Bank NA 14841 Dallas Pkwy # 300 Dallas, TX 75254-7883</p> <p>Wells Fargo Bank, NA Default Document Processing, N9286-01Y 1000 Blue Gentian Rd. Eagan, MN 55121-7700</p> <p>Wells Fargo Home Mortgage PO Box 10335 Des Moines, IA 50306-0335</p> <p>CSC of Rankin County, Inc.- Registered Agent for Americredit Financial Services, Inc. dba GM Financial Mirror Lake Plaza 2829 Lakeland Drive Suite 1502 Flowood, MS 39232</p> <p>C T Corporation System- Registered Agent for Financial Recovery Services 645 Lakeland East Drive, Suite 101 Flowood, MS 39232</p> <p>Corporation Service Company- Registered Agent for Portfolio Recovery Associates, LLC 7716 Old Canton Rd, Suite C Madison, MS 39110</p> <p>Corporation Service Company- Registered Agent for Wells Fargo Bank, N.A. 7716 Old Canton Rd, Suite C Madison, MS 39110</p>	<p>* U.S. Bank Home Mortgage 4801 Federica Street Owensboro, Kentucky 42301-7441</p> <p>* We Energies 231 W. Michigan St. Milwaukee, WI 53203-2918</p> <p>Wells Fargo Bank, NA 1000 Blue Gentian Rd. Eagan, MN 55121-7700</p> <p>Registered Agents, Inc- Registered Agent for Aurora Financial Group 270 Trace Colony Park STE B Ridgeland, MS 39157</p> <p>Corporation Service Company- Registered Agent for Harris and Harris LTD 7716 Old Canton Rd, Suite C Madison, MS 39110</p> <p>C T Corporation System- Registered Agent for Selene Finance 645 Lakeland East Drive, Suite 101 Flowood, MS 39232</p> <p>C T Corporation System- Registered Agent for Seterus, Inc 645 Lakeland East Drive, Suite 101 Flowood, MS 39232</p>	<p>* U.S. Bank Home Mortgage Bankruptcy Department PO Box 21948 Saint Paul, MN 55121-0948</p> <p>Wells Fargo Bank, N.A. Attention: Bankruptcy Department MAC# D3347-014 3476 Stateview Blvd. Fort Mill, SC 29715-7203</p> <p>Wells Fargo Bank, N.A. MAC x7801-014 3476 Stateview Blvd. Fort Mill, SC 29715-7203</p> <p>Registered Agent Solutions, Inc- Registered Agent for Audit Systems Inc. 12435 Plunkett Road Gulfport, MS 39503</p> <p>C T Corporation System- Registered Agent for Northland Group, Inc. 645 Lakeland East Drive, Suite 101 Flowood, MS 39232</p> <p>Corporation Service Company- Registered Agent for The Home Depot/CBSD 7716 Old Canton Rd, Suite C Madison, MS 39110</p>
---	---	--

\* Does not have Registered Agent